## Moskowitz Colson Ginsberg Schulman

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October 26, 2023

## **BY ECF**

Hon. J. Paul Oetken United States District Judge United States Courthouse 40 Centre Street New York, N.Y. 10017

Re: <u>U.S. v. Carlos Alberto Ramirez</u> 20 Cr. 29 (JPO)

Dear Judge Oetken:

This letter is respectfully submitted on behalf of Carlos Alberto Ramirez, to request early termination of his term of supervised release, which has only five months left.

As Your Honor may recall, Mr. Ramirez pled guilty to narcotics related charges on June 11, 2020. On October 20, 2020, Your Honor sentenced him to a term of imprisonment of 18 months to be followed by a term of supervised release of three years. Mr. Ramirez completed his sentence without incident and has been on supervised release for approximately the past thirty-one months, during which he has been working steadily as a truck driver and has not had any violations.

Mr. Ramirez was recently offered a better job as an interstate long-haul trucker. If allowed to accept the job, he would be travelling regularly outside of California. Given the schedule required by that job, it would be difficult for Mr. Ramirez to continue to be under supervision. In light of the fact that he only has five months remaining on his term of supervised release and the fact that he has not had any violations in the thirty-one months that he has been under supervision, it is respectfully submitted that he has proven that he is completely rehabilitated and no longer requires the supervision of the Probation Department.

I have spoken to Probation Officer Agustin Sanchez, who advised me that although the Probation Department has a policy that prohibits it from endorsing a request for early termination, he has no objection to the request. I also spoken to AUSA Daniel Nessim who advised that while the Government has no objection to allowing Mr. Ramirez to travel freely outside of California for work, it opposes early termination of his supervised release.

Thank you in advance for your consideration of this letter.

Respectfully submitted,

Avraham C. Moskowitz

Granted. It is hereby ordered that defendant Carlos Alberto Ramirez be discharged from his 3-year term of Supervised Release.

So ordered.

10/30/2023

J. PAUL OETKEN

United States District Judge